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Attorneys for Plaintiff Pacific Information Resources, Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

Pacific Information Resources, Inc., a  
 California Corporation,

Plaintiff,

vs.

SIMPLE COMMUNICATIONS, an Alabama  
 corporation; WILLIAM TRAVIS SULLIVAN,  
 individually, AND DOES 1 through 100,  
 inclusive, WHOSE IDENTITIES ARE  
 UNKNOWN,

Defendants.

**CASE NO. CV-07-4131 MMC**

**[Before the Honorable Maxine M.  
 Chesney, Courtroom 7]**

**PLAINTIFF'S REQUEST TO  
 CONTINUE DATE FOR FILING  
 MOTION FOR DEFAULT JUDGMENT  
 AGAINST WILLIAM TRAVIS  
 SULLIVAN AND SIMPLE  
 COMMUNICATIONS**

Complaint Filed: August 9, 2007  
 Discovery Cut-Off: N/A  
 Trial: N/A  
 Status Conference: February 8, 2008

**TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR  
 ATTORNEYS OF RECORD HEREIN:**

Plaintiff Pacific Information Resources, Inc. ("Plaintiff") hereby requests a continuance  
 of the Court to file its Default Judgment Application on February 22, 2008, instead of on  
 February 15, 2008. Plaintiff makes this request on the basis of good cause, extreme hardship,  
 and circumstances quite beyond its control. Plaintiff's counsel, Novo Law Group, P.C., is a

1 small firm, and only has one full time legal assistant/secretary/paralegal, Renee Nordyke. She is  
2 principally responsible for the preparation of our documents, including making edits and  
3 revisions to documents and finalizing them for filing with the court. *See Declaration of Renee*  
4 *Nordyke, filed concurrently herewith, at pages 1-2.*

5 Mr. Trope, the Managing Shareholder, has typing skills and computer skills, but not at a  
6 level of an experienced legal secretary/assistant with 20 years of experience, as Ms. Nordyke.  
7 *See Id.*

8 Ms. Nordyke has been “*out of commission*” all this week recovering from dental surgery  
9 and complications which arose from the surgery. *Id. at page 2.* Thus Novo Law Group has been  
10 severely handicapped in completing this filing as well as others. Ms. Nordyke was expected to  
11 miss ½ day of work, not the entire week, and part of next week as well. *Id.*

12 On Monday, February 11, 2008, Ms. Nordyke went to the dentist for follow-up and  
13 finishing of one of two root canals. *Id.* At this time she also had the dentist complete the  
14 preparation for the crowns. She was at the dentist office from 8:45 a.m. to approximately 1:00  
15 p.m. There was a complication with one of her teeth and the ***gum around the tooth had to be***  
16 ***clipped in order to prepare it for a crown. Id.***

17 On Tuesday, February 12, 2008, Ms. Nordyke awoke with gums so swollen that she could  
18 not properly swallow. In addition, she was in severe pain. After contacting the dentist, she  
19 started taking antibiotics to fight the resulting infection, as well as ***Vicadin, an extremely strong***  
20 ***narcotic for pain.*** She has been on both antibiotics and Vicadin all this week. *Id.*

21 While taking this medication, Ms. Nordyke has not been able to perform her usual duties  
22 for drafting, preparing or filing documents. *Id.*

23 There will be no prejudice to any party who has direct or related interest in this case,  
24 including those parties who are Defendants in the related case noted herein.

1 Plaintiff humbly requests this extension in order to properly comply with all statutory and  
2 local criteria for granting the Default Judgment Application.

3 Respectfully submitted,

4 DATED: February 15, 2008

**NOVO LAW GROUP, P.C.**

5 BY: /s/Konrad L. Trope, Esq.  
6 California State Bar No. 133214  
7 Novo Law Group, P.C.  
8 4631 Teller Avenue, Ste 140  
9 Newport Beach, California 92660  
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12 E-mail: ktrope@novolaw.com  
13 Attorneys for Plaintiff PACIFIC  
14 INFORMATION RESOURCES,  
15 INC.

16 **[PROPOSED] ORDER**

17 Plaintiff Pacific Information Resources has hereby requested continuance to file its  
18 Defaults Judgment Application against Defendants William Travis Sullivan and Simple  
19 Communications to February 22, 2008.

20 Having considered the requested extension, good cause appearing, therefore, and no  
21 prejudice any parties appearing, IT IS HEREBY ORDERED that:

22 Plaintiff shall file its Application for Default Judgment not later than February 22, 2008.

23 Dated: \_\_\_\_\_

24 Honorable MAXINE M. CHESNEY  
25 United States District Judge

**PROOF OF SERVICE**

I am employed in the County of Orange, State of California in the office of a member of the Bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is: **4631 Teller Avenue, Suite 140, Newport Beach, California 92660.**

On **February 15, 2008**, I served the foregoing document described as:

**PLAINTIFF'S REQUEST TO CONTINUE DATE FOR FILING MOTION  
FOR DEFAULT JUDGMENT AGAINST WILLIAM TRAVIS SULLIVAN  
AND SIMPLE COMMUNICATIONS**

on the interested parties in this action by placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

***SEE ATTACHED SERVICE LIST***

**XX BY MAIL:** I deposited such envelope in the mail at Newport Beach, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

**BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the addressee at the address on the attached Mailing List.

**BY FEDEX:** I deposited such envelopes at Irvine, California for collection and delivery by Federal Express with delivery fees paid or provided for in accordance with ordinary business practices. I am "readily familiar" with the firm's practice of collection and processing packages for overnight delivery by Federal Express. They are deposited with a facility regularly maintained by Federal Express for receipt on the same day in the ordinary course of business.

**BY FACSIMILE:** I transmitted the foregoing document by facsimile to the party(s) identified above by using the facsimile number(s) indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL:** I transmitted the foregoing document by e-mail to the party(s) identified above by using the Internet Protocol Addresses indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL WITH CLERK OF THE COURT:** I certify that on 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing as indicated on the attached Mailing List.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **February 15, 2008**, at Los Angeles, California.

/s/  
Konrad L. Trope

***SERVICE LIST:***

*Pacific Information Resources v Simple Communications, et. al.*  
Case No. C-07-4131 MMC

**VIA U.S. MAIL**

William Travis Sullivan  
4931 Mason Road  
Clayton, Washington 99110

Simple Communications  
4931 Mason Road  
Clayton, Washington 99110

Simple Communications  
701 22nd Avenue  
Tuscaloosa, Alabama 35401